



Save The River

Protecting the St. Lawrence River through Advocacy, Education and Research

August 24, 2009

VIA ELECTRONIC FILING

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Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Comments on application for preliminary permit for the
Massena Grasse Hydroelectric Project No. 12607-004, Town of Massena,
on the Grasse River, St. Lawrence County, New York.

Dear Secretary Bose;

We have reviewed the application filed by the Massena Electric Department for a preliminary permit to study the feasibility of the Massena Grasse Hydroelectric Project No. 12607-004 and are writing to express significant concerns about the project.

Save The River is a grassroots environmental advocacy group that has been working for more than 30 years to protect the Upper St. Lawrence River through advocacy, education and research. We are a member-based organization representing more than 1,200 individuals and families who live, work and play along the River and its tributaries.

Hydropower projects pose a significant threat to any river ecosystem, impacting fisheries resources and wildlife habitat. In particular, hydropower projects serve as impediments, blocking movements of migratory fish as they move between rivers, lakes and tributaries to spawn and carry out their complex life cycles.

Two species in particular would be impacted by the proposed Massena Grasse Hydroelectric project - Lake Sturgeon and American Eel. Lake Sturgeon migrate within the Great Lakes system and its tributaries, traveling upstream to shallow riffle sites to spawn, while the American Eel travels into freshwater to live its adult life in the system and its tributaries before traveling back to the Sargasso Sea to spawn. The construction of a dam in a currently unrestricted, natural stretch of the Grasse River would significantly limit the movements and life-cycle of both species.

Lake Sturgeon (*Acipenser fulvescens*) rely on the variable habitat of the Great Lakes-St. Lawrence River basin for spawning and its other life stages. These unique fish are classified as "threatened" in New York State and are struggling to survive amongst the many impediments already in place throughout the Great Lakes-St. Lawrence River basin. The proposed Massena Grasse Hydroelectric project would create a significant impediment for Lake Sturgeon as they travel upstream to spawn. Additionally, the proposed project will also flood and slow the fast moving waters of the Grasse River, which are one of the few natural areas remaining in the region for Lake Sturgeon spawning.

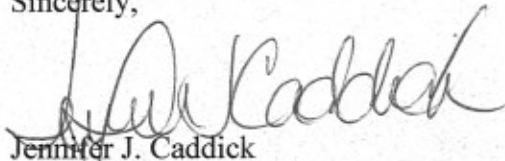
Historically, American Eel and Lake Sturgeon have been devastated by hydropower projects already in place throughout the region, such as the Moses-Saunders Power Dam on the mainstem of the St. Lawrence River. These structures have devastated the American eel population by impeding the species' ability to travel from the region's freshwater to their ocean spawning grounds. Additionally, they have changed flows in the St. Lawrence River, damaging historic Lake Sturgeon spawning grounds.

The Massena Grasse Hydroelectric Project has the potential to significantly damage any remaining populations of both species and to seriously hamper restoration efforts to restore the region's American eel and Lake Sturgeon populations. Save The River is deeply concerned about the construction of additional structures within the St. Lawrence River and its tributaries, such as the Grasse River, that could impede fish movement or damage existing fish spawning grounds and nursery habitat.

Save The River urges that the Massena Grasse Hydroelectric project be subject to lengthy, independent scientific review before further consideration by the Federal Energy Regulatory Commission. Fully understanding the environmental impacts of this proposed project is absolutely necessary to determine project feasibility. If environmental studies find that the project will create further degradation of the regional ecosystem or impede regional restoration efforts, the project should not proceed.

Thank you for considering our comments. If you should have any questions, please do not hesitate to contact me via phone at (315) 686-2010 or via e-mail at jennifer@savetheriver.org.

Sincerely,



Jennifer J. Caddick

Executive Director & Upper. St. Lawrence Riverkeeper

cc:

Ms. Judy Drabicki, Director, NY DEC Region 6

Mr. David A. Stilwell, Field Supervisor, U.S. Fish and Wildlife Service

Mr. Andrew L. Raddant, Regional Environmental Officer, U.S. Department of the Interior

Mr. Ken Jock, Director, Environment Division, St. Regis Mohawk Tribe